

1 J. Stephen Roberts, Jr.
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6 Attorneys for Ms. Rand

7 UNITED STATES DISTRICT COURT
8 EASTERN DISTRICT OF WASHINGTON
9 The Honorable Alexander C. Ekstrom

10 United States of America,

11 Plaintiff,

12 v.

13 Casandra Charlene Hope Rand,

14 Defendant.

No. 2:19-CR-00185-WFN-2

**Motion to Reopen Detention
Hearing**

Spokane - With Oral Argument

August 24, 2022 at 3:00 p.m.

15 Casandra Rand (“Ms. Rand”) moves the Court to reopen her detention hearing. A
16 hearing date is set for August 24, 2022 at 3:00 p.m. in Spokane, Washington. Ms. Rand
17 requests that the Court release her from Spokane County Jail on August 25, 2022, by 8:00
18 a.m. For the reasons that follow, the Court should grant the motion and release Ms. Rand
19 to a clean and sober living facility: Ruth Park Oxford House located at 5917 N.
20 Washington St., Spokane, WA 99205.

21 Ms. Rand is participating in a pretrial diversion agreement entered on April 19,
22 2021. ECF No. 157. After entry of the Agreement, Ms. Rand resided in Spokane, and
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24

1 later Seattle where she admittedly struggled with substance abuse issues and maintaining
2 compliance with her court-ordered treatment facilities.

3 She was arrested most recently on June 7, 2022, in the Western District of
4 Washington on violations related to being terminated from her Oxford House and for not
5 entering into treatment through her Oxford House. *See* ECF Nos. 182, 194. Ms. Rand was
6 then transported through Rule 5 proceedings and brought to the Eastern District of
7 Washington on June 16, 2022, where she was seen by the District Court and waived her
8 detention hearing. Ms. Rand is currently in custody at the Spokane County Jail and has.

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10 On July 25, 2022, Ms. Rand was last before the District Court to address her most
11 recent violations related to the pretrial diversion agreement. ECF No. 197. The District
12 Court made no findings on the violations and ordered her to remain in custody while
13 defense counsel sorted out an acceptable release plan. *Id.* In its order, the District Court
14 gave this Court the authority to hear the instant motion if filed before September 15,
15 2022.

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17 Ms. Rand now moves the Court to release her on the conditions previously
18 imposed and to approve her residence:
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1 Ruth Park Oxford House located at 5917 N. Washington Street, Spokane, WA
2 99205. ¹ Undersigned counsel verified with House Manager Summer Lowry that Ms.
3 Rand has a bed confirmed if released on Thursday, August 25. Ms. Rand would then be
4 transported from the jail to the Oxford House by her mother Wanda Rand, which was
5 also confirmed by defense counsel.
6

7 Finally, undersigned counsel confirmed that Ms. Rand has a scheduled substance
8 abuse evaluation and intake set for Thursday, August 25 at 10:30 p.m. through Spokane
9 Addiction Recovery Centers (SPARC). Her expected level of care is intensive outpatient.

10 Both the Government (AUSA Caitlin Baunsgard) and the U.S. Probation Office
11 (USPO Emely Cubias) were contacted in regard to the Motion. Neither Ms. Baunsgard
12 nor Officer Cubias have an objection the proposed release plan, however, Officer Cubias
13 has voiced a continuing objection to Ms. Rand remaining in pretrial diversion – due to her
14 history of repeated violations.
15

16 In sum, Ms. Rand asks that the Court find good cause to grant the Motion and
17 release her from the Spokane County Jail on Thursday, **August 25, 2022, no later than**
18 **8:00 a.m.** She requests release on the conditions previously imposed, to include release
19 to the Ruth Park Oxford House in Spokane, Washington, as outlined above.
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23 ¹See <https://www.transitionalhousing.org/li/oxfordhouseruthpark>, last accessed August 23, 2022.
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1 Dated: August 23, 2022

2 Respectfully Submitted,

3 /s/ J. Stephen Roberts, Jr.

4 J. Stephen Roberts, Jr., WA 45825

5 Attorneys for Ms. Rand

6 Federal Defenders of

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10 **CERTIFICATE OF SERVICE**

11 I hereby certify that on August 23, 2022, I electronically filed the foregoing with
12 the Clerk of the Court using the CM/ECF System which will send notification of such
13 filing to the following: Baunsgard, Caitlin, Assistant United States Attorney.

14 /s/ J. Stephen Roberts, Jr.

15 J. Stephen Roberts, Jr., WA 45825

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